

OCT 27 2005

Law Office of G. Anthony Long
P. O. Box 504970
Second Floor Lim's Bldg.
San Jose, Saipan, MP 96950
Telephone No. (670) 235-4802
Facsimile No. (670) 235-4801

For The Northern Mariana Islands
By _____
(Deputy Clerk)

Attorney for Defendant Dong Guk

**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

JUNG SOON LEE, (Deceased)) CIVIL ACTION NO. 05-0031
By SUNG YOUNG LEE, Personal)
Representative)
Plaintiff)
) DEFENDANT'S PROPOSED CASE
v.) MANAGEMENT SCHEDULE
DONG GUK CORPORATION)
)
Defendant) Date Oct. 28, 2005
) time: 8:30 a.m.

Comes now defendant Dong Guk Corporation ("DGC") which submits the following proposed Case Management Conference Statement:

(a) Service of Process:

The defendant has been served.

1 **(b) Jurisdiction and Venue:**

2 Subject matter jurisdiction and venue is proper.

3
4
5 **(c) Track Assignment:**

6 Standard

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9 **(d) Anticipated motions:**

10 At this time, the motions defendant anticipate filing include, but are not
11 limited to the following:

- 12
13 1. Motion to amend answer;
14 2. Discovery motions;
15
16 3. Summary Judgment; and
17 4. In limine motion
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20 **(e) Anticipated Discovery and Limitation on Discovery:**

- 21 1. Interrogatories, request to product and a request for admissions will be
22 served upon plaintiff .
23
24 2. Defendant anticipates taking three (3) to five (5) depositions of fact
25 witnesses and depose expert witness, if any, identified by plaintiff .
26

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2 **(f) Further proceedings:**

3 Plaintiff leaves the setting of the proceedings to the court.
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5

6 **(g) Special Procedures:**

7 Not necessary.
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10 **(h) Modification of the standard pre-trial procedures:**

11 No modifications necessary.
12
13

14 **(I) Settlement prospects:**

15 Defendant need to conduct discovery prior to determining the settlement
16 value, if any, of this claim.
17
18

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20 **(j) Limitation of issues:**

21 No limitation is necessary, at this time.
22
23

24 **(k) Setting of dates:**

25 Defendants request the following dates:
26
27

- 1 1. Motions to amend and supplement pleadings filed on or before December 15,
- 2 2005;
- 3 2. All discovery served so as to be completed by March 13, 2006;
- 4
- 5 3. Discovery motions filed on or before April 6, 2006;
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- 7 4. Settlement Conference on April 21, 2006;
- 8
- 9 3. All dispositive motions heard on or before May 25, 2006;
- 10
- 11 4. Final Settlement Conference on June 9, 2006;
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- 13 5. Joint pre-trial order June 17, 2006
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- 15 6. Final Pre-trial conference June 17, 2006; and
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- 17 4. Trial date of June 26, 2005 at 9:00 a.m.
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Dated this 27th day of October, 2005.

Law Office of G. Anthony Long

By: 

G. Anthony Long